

UNITED STATES DISTRICT COURT
FOR THE
DISTRICT OF MASSACHUSETTS

_____)	
JOHN HANCOCK LIFE INSURANCE)	
COMPANY, JOHN HANCOCK)	
VARIABLE LIFE INSURANCE)	
COMPANY, and INVESTORS)	
PARTNER LIFE INSURANCE)	
COMPANY,)	
)	
Plaintiffs,)	CIVIL ACTION NO. 03-12501-DPW
)	
v.)	
)	
ABBOTT LABORATORIES,)	
)	
Defendant.)	
_____)	

**PLAINTIFFS' MOTION FOR
LEAVE TO FILE REPLY**

Plaintiffs John Hancock Life Insurance Company, John Hancock Variable Life Insurance Company, and Investors Partner Life Insurance Company (collectively, "John Hancock") hereby move, pursuant to Rule 7.1(B)(3), for leave to file the accompanying six-page Reply Brief in support of its Motion to Compel. As grounds for this Motion, John Hancock states that the Reply Brief is necessary to address factual and legal contentions set forth by Defendant in its Opposition to the Motion. John Hancock further believes that the Reply Brief will be helpful to the Court in its adjudication on the merits of the Motion.

WHEREFORE, John Hancock respectfully requests that it be permitted to file the accompanying Reply Brief.

Respectfully Submitted,

JOHN HANCOCK LIFE INSURANCE
COMPANY, JOHN HANCOCK VARIABLE LIFE
INSURANCE COMPANY, AND INVESTORS
PARTNER LIFE INSURANCE COMPANY,

By Their Attorneys,

/s/ Karen Collari Troake

Brian A. Davis (BBO No. 546462)

Michael Arthur Walsh (BBO No. 514875)

Karen Collari Troake (BBO No. 566922)

CHOATE, HALL & STEWART

Exchange Place

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Dated: August 20, 2004

CERTIFICATE OF COMPLIANCE WITH LOCAL RULE 7.1(A)(2)

The undersigned hereby certifies that counsel for John Hancock Life Insurance Company, John Hancock Variable Life Insurance Company, and Investors Partner Life Insurance Company has conferred with Abbott Laboratories' counsel and that Abbott Laboratories objects to the filing of Plaintiffs' Motion For Leave To File Reply.

/s/ Karen Collari Troake
Karen Collari Troake